

Date: 5/7/99

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, Maryland 20852

3959 '99 MAY 19 P3:24

Re: Docket # 98N-1038, "Irradiation in the Production, Processing, and Handling of Food"

To whom it may concern:

Thank you for taking comments on this issue.

1) Should the wording of the current radiation disclosure statement be revised?

Absolutely not. Proposed alternative terms such as "cold pasteurization" and "electronic pasteurization" are misleading and should not be used. The current terminology of 'treated with radiation' or 'treated by irradiation', and the use of the radura symbol should be retained.

The public deserves honest, forthright labeling which is prominent, easy to read, and proximate to the name of the food, or the point of labeling is completely missed.

2) Should labeling requirements expire at a specified date in the future?

Again, absolutely not. The requirement for irradiation disclosure (both label and radura) should not expire at any time in the future.

Independent studies have shown that there are risks associated with this technology. Processing by irradiation causes chemical changes that are not evident and are potentially hazardous. Meat may have a higher level of carcinogenic benzene. All irradiated foods contain unique radiolytic products that have never been tested. In addition, consumer acceptability, storage qualities and nutrients are affected. Some irradiated foods have different texture and spoilage characteristics than untreated foods. Most fruits and vegetables have nutrient losses that are not obvious or expected by the consumer.

Whether or not the FDA has approved irradiation as safe, it remains a new technology with no long-term human feeding studies. Consumers certainly have a right to know if this process has been used on their food, and deserve the ability to make informed decisions, now and in the future.

Because of the newness of the technology and the need to assess the public health effects of widespread use of irradiated foods, I believe that the FDA's labeling requirement should NOT be permitted to expire.

Thank you again for inviting my comments.

Sincerely,



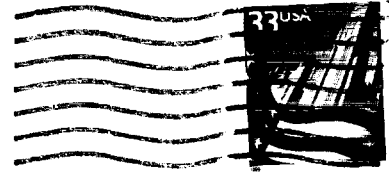
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